

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)**

<p>BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com</p> <p><i>Proposed Counsel for the Official Committee of Unsecured Creditors</i></p> <p>-and-</p> <p>GENOVA BURNS LLC. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 230-2095 Fax: (973) 533-1112 Email: DStolz@genovaburns.com DClarke@genovaburns.com GKinoian@genovaburns.com</p> <p><i>Proposed Local Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>BROWN RUDNICK LLP Stephen D. Palley, Esq. 601 Thirteenth Street, NW Washington, DC 20005 Telephone: (202) 536-1700 Fax: (202) 536-1701 Email: spalley@brownrudnick.com</p>
<p>In re: BLOCKFI INC., <i>et al.</i>, Debtors.</p>	<p>Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered)</p> <p>Hearing: January 27, 2023 at 9:00 a.m.</p>

**NOTICE OF MOTION APPLICATION IN SUPPORT OF THE MOTION OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO SEAL THE REDACTED
PORTIONS OF THE DECLARATION OF MOSHIN MEGHJI OF M3 PARTNERS
[DOCKET NO. 363] AND GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**,” the “**Company**,” or “**BlockFi**”), by and through its proposed counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”) for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the redacted portions of the Declaration of Moshin Meghji (the “**Meghji Declaration**”) [Docket No. 363],¹ a Managing Partner of M3 Partners, the Committee’s proposed financial advisors, in further support of (i) the Committee’s initial objection filed on January 13, 2023 (the “**Initial KERP Objection**”) [Docket No. 280] and supplemental objection filed on January 17, 2023 (the “**Supplemental KERP Objection**”) [Docket No. 310], to the *Debtors’ Motion for Entry of an Order (I) Approving the Debtors’ Retention Programs and (II) Granting Related Relief* [Docket No. 21-1] (the “**KERP Motion**”) filed November 28, 2022, and (ii) the Committee’s objection filed on January 13, 2023 (the “**Moelis Objection**”) [Docket No. 279] to the *Application of the Debtors and Debtors in Possession for Entry of an Order Authorizing the Retention and Employment of Moelis & Company LLC as Investment Banker, Capital Markets Advisor, and Financial Advisor Effective as of the Petition Date* (the “**Moelis Application**”) [Docket No. 139] filed on December 23, 2022, and (B) granting the Committee such other and

¹ The redacted version of the Meghji Declaration [Docket No. 363] was filed prior to the filing of this Motion to Seal. An unredacted version of the Supplemental Objection is being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (see [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](https://www.uscourts.gov/process-electronically-request-document-sealed-united-states-bankruptcy-court-district-new-jersey)).

further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that, substantially contemporaneously with the filing of the Motion to Seal, the Committee has also filed an *Application for Order Shortening Time and Certain Other Relief* (the “**Scheduling Application**”) requesting that the hearing on the Motion to Seal be scheduled contemporaneously with the Debtor’s Motion, which is currently scheduled to be heard on January 27, 2023 at 9:00 a.m.

PLEASE TAKE FURTHER NOTICE that objections, if any must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received in accordance with the Court’s order entered with respect to the Scheduling Application.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: January 24, 2023

GENOVA BURNS LLC

By: /s/ Donald W. Clarke

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

Gregory S. Kinoian, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

Tel: (973) 230-2095

Fax: (973) 533-1112

Email: DStolz@genovaburns.com

DClarke@genovaburns.com

GKinoian@genovaburns.com

Proposed Local Counsel for the Official Committee of Unsecured Creditors